

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS

- - - - -x
STALIN RODRIGO REYES ESPINOZA,
Plaintiff,

-against-
DAVS PARTNERS LLC AND KALNITECH
CONSTRUCTION COMPANY,

Defendants.

- - - - -x
Veritext Virtual

November 17, 2021
12:11 p.m.

EXAMINATION BEFORE TRIAL of STALIN
RODRIGO REYES ESPINOZA, the Plaintiff in
the above-entitled action, held at the
above time and place, taken before Carol
Ellinghaus, a Notary Public of the State
of New York, pursuant to an Order and
stipulations between Counsel.

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2 APPEARANCES:

3 GORAYEB & ASSOCIATES, PC
4 Attorneys for Plaintiff
5 100 William Street, Ste. 1900
6 New York, New York 10039

7 BY: JARED TURCO, ESQ.

8 RICHMAN & LEVINE, PC
9 Attorneys for Defendant
10 Dava Partners, LLC
11 666 Old Country Road
12 Garden City, New York 11530

13 BY: KETH RICHMAN, ESQ.

14 LAW OFFICE OF MICHAEL SWIMMER
15 Attorneys for Defendant
16 Kalnitech Construction Company
17 605 3rd Avenue, 9th Floor
18 New York, New York 10158

19 BY: ROBERT BRIGANTIC, ESQ.

20 ALSO PRESENT: Daniel Rodriguez,
21 Spanish Interpreter
22 Nora Youmans,
23 Spanish Interpreter
24
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* * *

1 S. Espinoza

2 Q. Prior to lunch, we were talking
3 about your second job while you were
4 living in the United States of putting
5 metals or columns for interior walls.

6 You said you started in or about
7 January of 2019 and worked there for two
8 months; correct?

9 A. Yes.

10 Q. What was the reason you left
11 that job?

12 A. Because they didn't have any
13 jobs.

14 Q. What was your next job?

15 A. Working with this gentleman.

16 Q. Working with what gentleman?

17 A. With the company. The company.

18 Q. We are talking about Jim
19 Associates?

20 A. Yes.

21 Q. When did you start working for
22 Jim Associates, what month?

23 A. Approximately in May.

24 Q. Of what year?

25 A. 2019.